

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

-v-

ANDREY KOSTIN et al.,

Defendants.

Case No. 1:24-cr-00091 (GHW)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of Defendant Vadim Wolfson's Motion to Modify Filter Team Procedures and for Injunction Against Release or Review of Records Pending Ruling, the Declaration of David C. Rybicki, dated April 16, 2024, and all other papers and proceedings herein, Defendant Vadim Wolfson will move this Court, before the Honorable Gregory H. Woods, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, on the date and time to be set by the Court, for an Order Modifying Filter Team Procedures and for Injunction Against Release or Review of Records, and granting Defendant Vadim Wolfson such other fair and equitable relief as may be appropriate.

Dated: April 16, 2024

/s/ David C. Rybicki  
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